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5 **-and-**

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13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 vs.

18 KOFI SARFO,  
19 ROSE SARFO

Defendants.

Case No. 23-cr-0132-APG-EJY

**JOINT STIPULATION TO EXTEND  
THE TIME FOR THE PARTIES TO  
FILE PRETRIAL MOTIONS AND FOR  
DEFENDANTS TO FILE NOTICES OF  
DEFENSE**

**[THIRD REQUEST]**

20 Pursuant to the Court's Local Rule of Criminal Practice 45-1, the parties hereby  
21 stipulate, subject to the Court's approval, to permit the parties additional time, or until April 3,  
22 2024, to file pretrial motions (including extending to that date Dr. and Mrs. Sarfo's deadline for  
23 filing notices of defense). By Order issued November 20, 2023, the current deadline for filing  
24 pretrial motions and notices of defense is March 19, 2024. *See* ECF No. 35. This is the parties'  
25 third stipulation to extend the pretrial motions and notices of defense deadlines (*See* ECF Nos.  
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1 23 and 29). This Stipulation does not seek to extend the current trial which is scheduled to  
2 commence on June 17, 2024. ECF No. 35.

3 This Stipulation is supported by good cause. Defense counsel, as recently explained to  
4 government counsel, have been working diligently toward meeting the current deadline for  
5 filing pretrial motions in this case while at the same time balancing other case commitments.  
6 However, and as explained to government counsel, additional time will be needed because  
7 undersigned counsel for Mrs. Sarfo has a trial commencing on April 15, 2024 in a complex  
8 medical malpractice case which has required counsel to devote significant time to that while at  
9 the same time working to meet the deadlines in this case. Similarly, counsel for Dr. Sarfo is  
10 also busy with competing case commitments in several cases, including out-of-town travel.  
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12 Counsel for the parties have conferred regarding these matters and agree that additional  
13 time to permit the parties to file their pretrial motions (including notices of defense by Dr. and  
14 Mrs. Sarfo) is warranted under the circumstances set forth herein. Should the Court approve  
15 this Stipulation, it will not affect the current trial date. Defendants further agree not to seek to  
16 continue the trial date as a result of the Court continuing the pretrial motions deadline.  
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1 For the reasons set forth in this joint Stipulation, the parties respectfully request that the  
2 Court approve this Stipulation.

3 DATED this 13<sup>th</sup> day of March 2024.

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5 /s/ *Kyle A. Crawford*  
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Kyle A. Crawford, Esq.  
Jessica Oliva, Esq.  
Andrew Tyler, Esq.  
*Counsel for the United States*

Respectfully submitted,

/s/ *Kathleen Bliss*  

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Kathleen Bliss, Esq.  
*Counsel for Dr. Kofi Sarfo*

/s/ *Paul S. Padda*  

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Paul S. Padda, Esq.  
*Counsel for Rose Sarfo*

**IT IS SO ORDERED:**

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The parties' joint Stipulation is hereby approved.  
Pretrial motions and notices of defense shall be filed on  
or before April 3, 2024.

  

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**UNITED STATES DISTRICT JUDGE**

**DATED:** March 14, 2024